

MARJORIE HAUF, ESQ.  
Nevada Bar No. 8111  
[mhauf@ganzhauf.com](mailto:mhauf@ganzhauf.com)  
JOHN C. FUNK, ESQ.  
Nevada Bar No. 9255  
[jfunk@ganzhauf.com](mailto:jfunk@ganzhauf.com)  
GANZ & HAUF  
8950 W. Tropicana Ave, Suite 1  
Las Vegas, Nevada 89147  
Telephone: (702) 598-4529  
Facsimile: (702) 598-3626  
*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DESHUN THOMAS, individually, and as Natural  
Parent and Guardian for LOZORYA JONES, and  
KRISTIN WOODS as Co-Guardian Ad Litem for  
LOZORYA JONES,

Plaintiffs,

vs.

BEVERLY DADE, in her official capacity;  
RICHARD FULLER, in his official capacity;  
PATTI SCHULTZ, in her official capacity; PAT  
SKORKOWSKY, in his official capacity;  
HELEN J. STEWART SCHOOL; and CLARK  
COUNTY SCHOOL DISTRICT, a Political  
Subdivision of the State of Nevada, DOE  
TEACHER'S AIDE in his/her official capacity,  
DOES I through X, inclusive; and ROES I  
through X, inclusive,

Defendants.

CASE NO.: 2:19-cv-00282-APG-PAL

**STIPULATION AND ORDER**  
**(FIRST REQUEST)**

**IT IS HEREBY STIPULATED** by and between the parties hereto, through their respective  
counsel of record, that the deadline for Plaintiffs to file their response to Defendants Motion to  
Dismiss Complaint (Dkt. 7, filed 02/22/2019), currently due March 7, 2019 be extended through  
March 20, 2019.



1 This is Plaintiff's first request for an extension. Plaintiffs' counsel who is responding to  
2 Defendants' motion is relatively new to the law firm GANZ & HAUF. On March 6, 2019 Plaintiffs'  
3 counsel John C. Funk, Esq., contacted opposing counsel, Crystal Herrera, Esq., requesting an  
4 extension as a professional courtesy. Plaintiffs' counsel requested the extension of time to respond  
5 based upon various personal and professional deadlines. Plaintiffs' counsel is getting married on  
6 March 16, 2019 and has been heavily involved in planning, coordinating and combining households  
7 all of which have had specific deadlines. For example, Plaintiffs' counsel must move his fiancé out  
8 of her current residence by Saturday, March 9, 2019.

10 Plaintiffs' counsel has spent his evenings moving, planning and preparing for family who are  
11 coming to Nevada from outside of the state for this significant event. Plaintiffs' counsel has several  
12 other personal matters also occurring this week as well as other professional deadlines which could  
13 not be moved.

14  
15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 The partners in Plaintiffs' counsel's firm are also preparing for a 7-10 trial with a firm setting  
2 which starts on March 15, 2019 and have been unable to assist in this or other pending matters.  
3 Plaintiffs submit their request is made and based upon good faith without purpose for undue delay.  
4

5 DATED this 6<sup>th</sup> day of March, 2019.

6 GANZ & HAUF

7 */s/ Marjorie Hauf, Esq.*

8 

---

MARJORIE HAUF, ESQ.

9 Nevada Bar No. 8111

10 [mhauf@ganzhauf.com](mailto:mhauf@ganzhauf.com)

11 JOHN C. FUNK, ESQ.

12 Nevada Bar No. 9255

13 [jfunk@ganzhauf.com](mailto:jfunk@ganzhauf.com)

14 8950 W. Tropicana Ave, Suite 1

15 Las Vegas, Nevada 89147

16 Telephone: (702) 598-4529

17 Facsimile: (702) 598-3626

18 *Attorneys for Plaintiffs*

DATED this 6<sup>th</sup> day of March, 2019.

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

*/s/ Crystal J. Herrera, Esq.*

---

S. SCOTT GREENBERG, ESQ.

Nevada Bar No. 4622

CRYSTAL J. HERRERA, ESQ.

Nevada Bar No. 12396

5100 West Sahara Ave.

Las Vegas, NV 89146

Telephone: (702) 799-5373

Facsimile: (702) 799-7243

Email: [Herrec4@nv.ccsd.net](mailto:Herrec4@nv.ccsd.net)

*Attorneys for Defendants*

18 IT IS SO ORDERED.

19 Dated: March 7, 2019.

20   
21 

---

UNITED STATES DISTRICT COURT JUDGE  
22  
23  
24  
25  
26  
27  
28